

# **EXHIBIT B**

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15 UNITED STATES DISTRICT COURT

16 DISTRICT OF NEVADA

17 Cung Le, Nathan Quarry, Jon Fitch, Brandon  
18 Vera, Luis Javier Vazquez, and Kyle  
Kingsbury on behalf of themselves and all  
19 others similarly situated,

20 Plaintiffs,

21 v.

22 Zuffa, LLC, d/b/a Ultimate Fighting  
Championship and UFC,

23 Defendant.  
24

Case No.: 2:15-cv-01045-RFB-(PAL)

**DEFENDANT ZUFFA, LLC'S  
[PROPOSED] DISCOVERY PLAN AND  
SCHEDULING ORDER**

Under Fed. R. Civ. P. 26(f) and Local Rule 26-1, the respective parties conducted a discovery planning conference on April 15, 2015. The parties previously submitted a joint proposal to this Court setting the case event dates up through the Class Certification hearing (ECF No. 206 at pp. 34-35). Plaintiffs also proposed dates that set out the timeframe of the briefing of dispositive motions, which this Court accepted and Ordered. (ECF No. 207). Zuffa, LLC hereby submits to the Court the following proposed Discovery Plan and Scheduling Order which includes the outstanding case schedule deadlines called for by the parties' previously considered and Ordered proposal.

|   |                     |
|---|---------------------|
| Close of Fact Discovery                               | March 31, 2017      |
| Plaintiffs' Opening Expert Reports (class and merits) | April 28, 2017      |
| Last Day to Depose Experts Concerning Opening Reports | May 26, 2017        |
| Opposition Expert Reports                             | June 23, 2017       |
| Last Day to Depose Opposition Experts                 | July 21, 2017       |
| Reply Expert Reports                                  | August 4, 2017      |
| Daubert Motions                                       | September 1, 2017   |
| Class Certification Motion                            | September 1, 2017   |
| Daubert Opposition Briefs                             | October 27, 2017    |
| Class Certification Opposition Brief                  | October 27, 2017    |
| Daubert Reply Briefs                                  | November 24, 2017   |
| Class Certification Reply Brief                       | December 15, 2017   |
| Class Certification Hearing                           | Court's Convenience |
| Summary Judgment Motions                              | February 22, 2018   |
| Summary Judgment Opposition Briefs                    | March 23, 2018      |
| Summary Judgment Reply Briefs                         | April 20, 2018      |

IT IS SO ORDERED.

Date: \_\_\_\_\_

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Honorable Peggy A. Leen  
UNITED STATES MAGISTRATE JUDGE